

**REMARKS**

The present response is to Office Action mailed in the above-referenced case on August 25, 2004. Claims 1-24 are presented below for examination. Claims 1-12 are rejected under 35 U.S.C. 103(a) as being unpatentable over Chao et al. (U.S. 6,338,092 B1), hereinafter Chao, in view of Goertzel et al. (U.S. 6,208,952 B1), hereinafter Goertzel. Claims 13-15 and 19-21 are rejected under 35 U.S.C. 103(a) as being unpatentable over Edsall et al. (U.S. 6,735,198 B1), hereinafter Edsall, in view of Cain et al. (U.S. 6,575,289 B1), hereinafter Cain. Claims 16 and 22 are rejected under 35 U.S.C. 103(a) as being unpatentable over Edsall in view of Cain, and further in view of Chao.

Applicant has again carefully studied the prior art references of record, and the new reference of Edsall provided by the Examiner in the present Office Action, and the Examiner's rejections and statements. In response, applicant slightly amends the language of the independent claims to clearly and unarguably distinguish applicant's claims over the prior art presented, either singularly or in combination. Applicant provides further argument that the prior art cited and applied by the Examiner, either singly or combined, does not anticipate or suggest all of the limitations of applicant's claims as amended. Applicant points out and argues the key and patentable limitations of applicant's claims as amended, as supported by the teachings of applicant's specification, which the prior art fails to teach, suggest or intimate.

Applicant herein amends the language of the independent claims to specifically recite that the first plurality of processors operates and create client-server pairs within a single data packet router. For convenience, applicant reproduces claim 1 as amended below.

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Claim 1 as amended now recites:

*1. In a distributed processor system wherein a first and a second protocol operating on individual ones of a first plurality of processors operating within a single data packet router are involved in independently generating or amending data for a single database, and wherein each of the first plurality of processors maintains a copy of the database, a method for synchronized maintenance and distribution of the database, comprising the steps of:*

*(a) registering each of the first plurality of processors with at least one other of the first plurality of processors, creating client-server pairs operating within the single data packet router, in an arrangement that each of the plurality of processors either runs or is registered with a processor running both the first and second protocols; and*

*(b) sharing the generated or amended data from the servers to the registered clients, such that each of the first plurality of processors receives generated or amended data from both the first and second protocols.*

Applicant's independent claims 7, 13 and 19 recite applicant's distributed processor system, and data packet routers in accordance with the limitations of claim 1 as amended, and are similarly amended.

In applicant's previous response applicant argued that Goertzel teaches an alternative invention for solving a completely different problem from that which is solved by applicant's claim invention, and achieves the end result in a different manner from that of applicant's invention, and that Goertzel fails to teach client-server pairs by registering each of the first plurality of processors with at least one other of the first plurality of processors. Further, applicant emphasized the internal aspect of the claimed invention, in that the first plurality of processors is within a single data packet router, not distributed over a plurality of nodes, as in

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the teachings of Goertzel.

In the Examiner's remarks of the instant Office Action, the Examiner has failed to adequately address the above arguments previously presented by applicant, in fact, the Examiner provides no Response to Arguments section at all in the instant Office Action, and no other arguments specifically addressing the above items are provided. Applicant's independent claims now specifically recite the key and patentable limitation, that the first plurality of processors operate, and create client-server pairs within a single data packet router.

Referring to the reference of Goertzel, specifically Fig. 3A and supporting description of the specification, it is clear as previously argued by applicant, that Goertzel teaches a method and system for delayed registration of a remote protocol for communication between a client computer system (310) and a server computer system (350), and between a client system (320) and a server system (360) i.e. between multiple servers. Applicant's invention, on the other hand teaches that the client-server relationship is between processors within a single data packet router. Applicant wishes to re-emphasize to the Examiner the importance of the internal aspect of applicant's invention, in that applicant's invention teaches a client-server relationship between processors within a single computer system, not between processors distributed over a plurality of systems, as in Goertzel. The important and patentable aspect of applicant's invention are that the database that is maintained in each of the first plurality of processors, and amended and updated from both the first and second routing protocols, and the real-time mapping of the connectivity of the internal system of the data packet router. The distributed processor system within such a single scalable router is an essential object of applicant's claimed invention.

Goertzel fails in teaching the creation of client-server pairs by registering each of the first plurality of processors, operating in a single data packet router, with at least one other of the first plurality of processors internal to the data

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packet router, such that individual ones of the first plurality of processors, even though many may be only running one protocol, are related in a client-server relationship with at least one other processor in the first plurality of processors running both protocols in the data single packet router. In the invention of Goertzel, multiple protocols are registered allowing a server to communicate with various clients over different protocols, but there is clearly no motivation in Goertzel for registering each of the first plurality of processors with at least one other of the first plurality of processors, creating client-server pairs in a single data packet router, an arrangement that each of the first plurality of processors either runs for his registered with a processor running both the first and second protocols, as is taught in applicant's invention, and now specifically recited applicant's independent claims.

Applicant's invention teaches a system and method for the distribution and synchronization of the routing database and forwarding table to a large number of entities within a distributed processor environment of a single scalable router, while Goertzel teaches delayed registration for communicating between a client computer system and a server computer system, i.e., multiple computer systems.

Applicant therefore believes that independent claim 1, as amended is now clearly and unarguably patentable over Chao in view of Goertzel, because Chao fails to teach processors running the first and second protocols, as stated by the Examiner in his remarks, and Goertzel now fails in combination for lacking the teaching or suggestion of the first plurality of processors operating in a single data packet router, and creating client-server pairs operating in the single data packet router. Depending claims 2-12 are then patentable over Chao/Goertzel on their own merits, or at least has depended from a patentable claim.

The Examiner has rejected claims 13-15 and 19-21 as unpatentable over the new reference of Edsall in view of Cain. Referring to the primary reference of Edsall, the teachings do not disclose or suggest that each of the plurality of

processors either runs or is registered with a processor running both the first and second routing protocols. Edsall also fails to specifically teach or suggest that the processors registered to each other operate on the same data packet router.

Now referring to the reference of Cain, specifically Fig. 5 and the supporting description in the specification, the Examiner has stated that Cain teaches that each of the plurality of processors either runs or is registered with a processor running both the first and second routing protocols (Fig. 5, col. for 4, lines 6-9, col. 6, lines 63-65 and col. 7, line 63-col. 8, line 33). However, upon careful and thorough review of the above-reference portions of Cain, as well as the remainder of the specification, it is clear that Cain teaches a distributed processor system running on a plurality of routers, and the plurality of routers communicating with each other using multiple various protocols. Applicant argues that the fact that Cain teaches that all of the processors run multiple protocols, does not read on applicant's specific claim limitation that each of the plurality of processors either runs or is registered with a processor running both the first and second protocols. In fact, the disclosure in Cain teaches away from applicant's invention, because, as previously argued by applicant regarding the reference of Goertzel, it is not necessary in applicant's invention that all of the processors run the first and second protocols in practice of the claimed system and method. Further, Cain teaches an apparatus and method for managing communication between a failed application and other executing applications, but the communications are clearly between a plurality of servers, not between processors within a single data packet router, as in applicant's invention. Specifically, Cain discloses (col. 4, lines 1-9), that the network includes a plurality of routers (12) cooperating to transmit data messages across the network, and each router (12) may be coupled to one or more smaller networks, and preferably supports more than one data routing protocol. Cain teaches further (col. 8, lines 1-4), simply that some of the coupled routers communicate with

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router A using one protocol, some communicate with router A using a different protocol, while still other routers communicate with router A using another protocol. While Cain teaches using multiple protocols for facilitating communication between multiple routers, the teaching clearly cannot read on applicant's specifically claimed limitation of each of the plurality of processors running or registering with a processor running both the first and second protocols, and that the client-server relationship is created between processors within the single data packet router.

For these reasons, applicant strongly believes that the commendation of Edsall/Cain fails to teach or suggest all of the limitations in applicant's independent claims as amended. Independent claims 13 and 19 are therefore clearly patentable over the commendation, and claims 14-15 and 20-21, all being dependent claims, are then patentable on their own merits, or at least as depended from a patentable claim.

Claims 16-18 and 22-24 are rejected as being unpatentable over Edsall in view of Cain, and further in view of Chao. As argued above on behalf of the independent claims, Edsall clearly fails as a primary reference for failing to teach or suggest all of the limitations of applicant's claims. Claims 16-18 and 22-24 depend from independent claims 13 and 19 respectively, both of which are now patentable as amended and argued above over the combination of Edsall/Cain. The Examiner relies on the reference of Chao for teaching clients registering with a second processor to create a redundant server-client relationship for fault tolerance. All of the depending claims 16-18 and 22-24 are therefore patentable on their own merits, or at least has depended from a patentable claim.

As all of the claims left standing and as amended and argued above are clearly shown to be patentable over the prior art either singly or in combination, applicant respectfully requests that the rejections be withdrawn, and that the case be passed quickly to issue.

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If any fees are due beyond fees paid with this amendment, authorization is made to deduct those fees from deposit account 50-0534. If any time extension is needed beyond any extension requested with this amendment, such extension is hereby requested.

Respectfully Submitted,

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